

IN THE DISTRICT COURT OF OKMULGEE COUNTY
STATE OF OKLAHOMA

TERRY HAMILTON,) CJ-2015- 139
Plaintiff,) CASE NO: CJ-2015
v.)
The Hartford Financial Services) ATTORNEYS LIEN CLAIMED
Group Inc.,) JURY TRIAL DEMANDED LAW DEPARTMENT
Hartford Life and Accident Inc.,)
Hartford Fire Inc.,) SEP 14 2015
Defendant.) LITIGATION UNIT

PETITION

COMES NOW the Plaintiff, Terry Hamilton, and for his cause of action against the Defendants, the Hartford Financial Services Group. Inc., Hartford Life and Accident Inc., and Hartford Fire Inc. (hereinafter referred to as Defendants) hereby alleges and states as follows, to-wit:

PARTIES

1. Plaintiff, Terry Hamilton (hereinafter sometimes referred to as "Plaintiff"), resides in Okmulgee County, Oklahoma.
2. Defendants are a foreign company licensed to and do conduct business in the State of Oklahoma.
3. Due to their association and organization, Defendants are liable for the actions of the others and/or their affiliated companies.
4. The events that give rise to the suit stem from an auto accident that occurred in Tulsa, County, Tulsa, Oklahoma.
5. This Court has subject matter jurisdiction over this case pursuant to the Oklahoma Constitution, Art. 7, Sec. 7.

Exhibit

6. Due to their association and organization, Defendants are each liable for the actions of the others and/or their affiliated companies.
7. Venue is proper under 12 O.S. 137, 187

COUNT ONE – BREACH OF CONTRACT

8. On out about September 8, 2010, in Tulsa County, Oklahoma, Plaintiff was involved in an automobile accident.
9. As a result of the accident, Plaintiff suffered bodily injuries, pain and suffering, and other personal injuries.
10. At the time of the accident, Plaintiff was insured for an Accidental Dismemberment Policy of Insurance written by the Defendants.
11. As an insured, Plaintiff is entitled to timely payment of policy benefits including but not limited to Accidental Dismemberment coverage.
12. Defendants have failed to make timely payment of the accidental dismemberment coverage and as such have breached the contract of insurance.
13. Additionally, Defendants failed to timely, properly, fully, and reasonably investigate the facts of the accident as well as the subsequent injuries to reasonably evaluate and pay Plaintiff's claim.

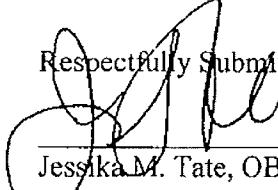
COUNT TWO- PUNITIVE DAMAGES

14. Plaintiff hereby adopts and re-alleges each of the facts and allegations set forth above.
15. The actions of Defendants during the handling of the Plaintiff's claim demonstrate they intentionally, and with malice, breached their duty to deal fairly and in good faith. The actions of Defendants were intentional, malicious and consistent with an overall

collective corporate goal of increasing profits through the systematic reduction or avoidance of claims. The Plaintiff therefore seeks punitive damages in amount in excess of 75,001.00.

WHEREFORE, Plaintiff prays for judgment against the Defendants in an amount in excess of \$75,001.00 for compensatory damages, punitive damages, together with attorney's fees, costs of this action, interest, and for such other relief as the court may deem just proper.

Respectfully Submitted,



Jessica M. Tate, OBA# 22103
Tate Law Firm
510 N. Sheridan Rd., Suite A
Tulsa, OK 74115
Phone: (918) 805-3955
Fax: (918) 430-3516
Attorney for the Plaintiff

ORIGINAL SUMMONS
IN THE DISTRICT COURT OF [REDACTED] COUNTY
STATE OF OKLAHOMA, [REDACTED] COUNTY, OKLAHOMA [REDACTED]

Case No. 11-1-1

Plaintiff(s)

Attorney(s) for Plaintiff(s)
Name _____
Address _____

45

Defendant(s)

Telephone _____

To the above-named defendant(s)

Appointed to serve. PSL# _____

Authorized by _____

You have been sued by the above named plaintiff(s), and you are directed to file a written answer to the attached petition and order in the court at the above address within twenty (20) days after service of this summons upon you exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the plaintiff. Unless you answer the petition within the time stated judgment will be rendered against you with costs of the action.

Issued this 1 day of January, 201.

Sally Howe Smith, Court Clerk

By _____, Deputy Court Clerk

(Seal)

This summons and order was served on

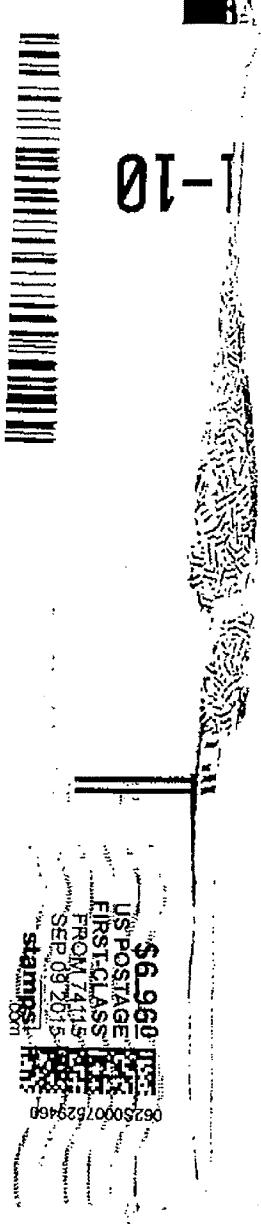
(date of service)

(Signature of person serving summons)

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THIS SUMMONS.

Return ORIGINAL for filing.

Tate Law Firm
510 N. Sheridan Rd Ste. A
Tulsa OK 74115-7844



7011 3500 0003 3605 5980
The Hartford Insurance
1 Hartford Plaza
Hartford CT 06155-0001

081554004

100-1-10

ORIGINAL SUMMONS
IN THE DISTRICT COURT OF [REDACTED] COUNTY
STATE OF OKLAHOMA, [REDACTED], OKLAHOMA [REDACTED]

Plaintiff(s)

Case No. 1-1-1-1

Plaintiff(s)

Attorney(s) for Plaintiff(s)

Name _____

Address _____

Defendant(s)

Telephone _____

To the above-named defendant(s)

Appointed to serve, PSL# _____

Authorized by

You have been sued by the above named plaintiff(s), and you are directed to file a written answer to the attached petition and order in the court at the above address within twenty (20) days after service of this summons upon you exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the plaintiff. Unless you answer the petition within the time stated judgment will be rendered against you with costs of the action.

Issued this 1 day of January, 2014

Sally Howe Smith, Court Clerk

By _____, Deputy Court Clerk

(Seal)

This summons and order was served on _____
(date of service)

(Signature of person serving summons)

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Page 1 of 2

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Last Update: Monday, September 14, 2015

Available Actions

| Postal Product | Features: | Available Actions |
|------------------------------|--------------------------|--------------------|
| | Certified Mail™ | Send Details |
| | Delivery Options | Delivery Options |
| September 14, 2015, 6:35 am | Arrived at Unit | HARTFORD, CT 06115 |
| September 14, 2015, 4:43 am | Arrived at Unit | HARTFORD, CT 06102 |
| September 12, 2015, 6:27 pm | Departed USPS Facility | HARTFORD, CT 06101 |
| September 12, 2015, 10:15 am | Arrived at USPS Facility | HARTFORD, CT 06101 |
| September 11, 2015, 5:39 am | Departed USPS Facility | TULSA, OK 74141 |
| September 10, 2015, 9:32 pm | Arrived at USPS Facility | TULSA, OK 74141 |

Map | Log into USPS4ME

Tracking (or receipt) number

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**ORIGINAL SUMMONS OKMULGEE
IN THE DISTRICT COURT OF [REDACTED] COUNTY
STATE OF OKLAHOMA, [REDACTED], OKLAHOMA [REDACTED]**

TERRY Hamilton

Case No. CS-2015-139

Plaintiff(s)

vs
The Hartford Financial Services

Group, Hartford Financial, Hartford Fi
Defendant(s)

Attorney(s) for Plaintiff(s)

Name Tessie M. Tate
Address 110 N Sheridan Rd Ste A

Telephone (918) 803-3933

Appointed to serve. PSL# _____

To the above-named defendant(s)

Authorized by

You have been sued by the above named plaintiff(s), and you are directed to file a written answer to the attached petition and order in the court at the above address within twenty (20) days after service of this summons upon you exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the plaintiff. Unless you answer the petition within the time stated judgment will be rendered against you with costs of the action.

Issued this 4 day of Sept 15, 2015.

FILED IN DISTRICT COURT
OKMULGEE COUNTY, OKLA
OKMULGEE DIVISION

Linda Beaver

Sally Howe-Smith, Court Clerk


By Linda Beaver, Deputy Court Clerk

SEP - 4 2015

(Seal)

LINDA BEAVER, COURT CLERK
By _____ Deputy

This summons and order was served on _____
(date of service)

(Signature of person serving summons)

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THIS SUMMONS.

Return ORIGINAL for filing.

IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA

CIVIL COVER SHEET

TYPE OF CASE (MUST CHECK ONE) & ALL INFORMATION REQUIRED

CJ-2015- 139

CIVIL

CJ (over \$10,000)
 CS (under \$10,000)
 CV (Miscellaneous Civil)
 SC (Small Claims-less than \$6,000)
 SC (Forcible E & D up to \$1,500)

FAMILY AND DOMESTIC

AI (Artificial Insemination)
 FA (Adoption)
 FD (Divorce)
 FI (Income Assignment)
 FP (Paternity)
 FR (Reciprocal)
 FMI (Miscellaneous)

PROBATE

PB (Probate)
 PC (Conservatorship)
 PG (Guardianship)
 FB (Full Blood)

FILED IN DISTRICT COURT
 OKMULGEE COUNTY, OKLA
 OKMULGEE DIVISION

PRINCIPAL CAUSE OF ACTION: Auto Negligence AMOUNT ENCLOSSED: \$

SEP - 4 2015

Defendant's Initial Pleading-Entry of Appearance/Answer/ 3rd Party Petition Existing Case No. _____

(MUST FILL OUT FOLLOWING INFORMATION)

ATTORNEY INFORMATION:Party Representing: Plaintiff

Name: Jessika M. Tate Firm: Tate Law Firm

Mailing Address: 510 N. Sheridan Rd., Ste. A City: Tulsa State: OK Zip Code: 74115

Phone Number: (918) 805-3955 Fax Number: (918) 430-3516

Bar # 22013 E-Mail Address jessika@jtatetulsalaw.com

Deputy

LINDA BEAVER, COURT CLERK

PLAINTIFF INFORMATION

NAME: Hamilton LAST Terry FIRST MIDDLE
 ADDRESS: 1302 E. 1st St., Apt. D MAILING ADDRESS 1302 E. 1st St., Apt. D
 CITY: Okmulgee STATE: OK ZIP: 74445 PHYSICAL ADDRESS
 DATE OF BIRTH: 03/09/1959 SOCIAL SECURITY NO./EIN: 440-64-0810
 D.L. NO. _____ PHONE NO. _____
 CELL PHONE NO. (918) 720-8793 E-MAIL ADDRESS _____

DEFENDANT INFORMATION

NAME: The Hartford Financial Services Group Inc LAST FIRST MIDDLE
 ADDRESS: One Hartford Plaza MAILING ADDRESS One Hartford Plaza
 CITY: Hartford STATE: CT ZIP: 06155 PHYSICAL ADDRESS
 DATE OF BIRTH: _____ SOCIAL SECURITY NO./EIN _____
 D.L. NO. _____ PHONE NO. _____
 Direct PHONE NO. _____ E-MAIL ADDRESS _____

SUMMONS INFORMATIONNUMBER OF SUMMONS TO BE ISSUED: 1 SUMMONS TO BE ISSUED BY COURT CLERK _____PETITION & SUMMONS TO BE SERVED BY:ISSUED TO ATTORNEY NO SUMMON ISSUED SHERIFF COUNTY: _____PROCESS SERVER: _____ PUBLICATION _____ REGISTERED /CERTIFIED MAIL